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Jury Trial Demanded

4. Defendant retains all rights to assert any defense under Federal Rule of Civil Procedure 12(b).

5. The Court has not yet entered a scheduling order, so this extension does not affect any other pre-trial deadlines.

6. Defendant's requested relief is not sought for purposes of delay, but with good cause and so that justice may be done.

Dated: December 29, 2020

Respectfully submitted,

/s/ Amir H. Alavi

Amir Alavi

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CERTIFICATE OF CONFERENCE

On December 28, 2020, Defendant conferred with Plaintiffs' counsel regarding the relief sought in this motion. Plaintiffs do not oppose the requested extension.

/s/ Amir Alavi

Amir Alavi

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2020, a true and correct copy of this document has been filed electronically via the Court's CM/ECF filing system and subsequently all counsel in this matter deemed to accept service electronically will be notified via the Court's CM/ECF filing system.

/s/ Amir Alavi
Amir Alavi